

**Hearing Date And Time: February 25, 2010 at 10:00 a.m. (prevailing Eastern time)**

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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
	:	
DELPHI CORPORATION, <u>et al.</u> ,	:	Case No. 05-44481 (RDD)
	:	
	:	(Jointly Administered)
Debtors.	:	
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**RESPONSE BY ROBERT BOSCH LLC TO THE REORGANIZED DEBTORS'  
FORTY-THIRD OMNIBUS CLAIMS OBJECTION  
[CLAIM NOS. 18690 AND 18692]**

Robert Bosch LLC, ("Bosch"), by and through its counsel, hereby submits this Response to the *Reorganized Debtors' Forty-Third Omnibus Objection Pursuant to 11 U.S.C. § 503(b) and Fed. R. Bankr. P. 3007 to (I) Expunge Certain Administrative Expense (a) Severance Claims, (b) Books and Records Claims, (c) Duplicate Claims, (d) Equity Interests, (e) Prepetition Claims, (f) Insufficiently Documented Claims, (g) Pension, Benefit, and OPEB Claims, (h) Workers' Compensation Claims, and (i) Transferred Workers' Compensation Claims, (II) Modify and Allow Certain Administrative Expense Severance Claims, and (III) Allow Certain Administrative*

*Expense Severance Claims* (Docket No. 19356, the “43<sup>rd</sup> Omnibus Claims Objection”). Bosch’s Response is set forth below:

1. On January 22, 2010, the Reorganized Debtors’ filed their 43<sup>rd</sup> Omnibus Claims Objection to two administrative claims filed by Bosch: Claim No. 18690 in the amount of \$71,676.37 and Claim No. 18692 in the amount of \$41,132.04 (collectively, the “Administrative Claims”).

2. After receiving the 43<sup>rd</sup> Omnibus Claims Objection, Bosch has been working with the Reorganized Debtors to resolve the remaining open issues with respect to the Administrative Claims. Most of the Administrative Claims had been paid prior to the filing of the 43<sup>rd</sup> Omnibus Claims Objection, and certain additional amounts have been paid after the Objection was filed.

3. At this time, the total amount owing to Bosch under the Administrative Claims is \$6,597.28. With the exception of \$69.98, Bosch has provided backup documentation to the Reorganized Debtors with respect to all of the \$6,597.28 owing. It is Bosch’s understanding that the position of the Reorganized Debtors with respect to payment of the \$6,597.28 is as follows:

- The Reorganized Debtors will pay for production parts in the amount of \$2,239.96.
- The Reorganized Debtors have not responded as to whether they will pay for certain aftermarket parts provided by Bosch totaling \$1,587.34 (consisting of two invoices, one in the amount of \$893.54 and the other in the amount of \$693.80).
- The Reorganized Debtors have not indicated whether they will pay for production parts in the amount of \$69.98 for which Bosch has produced an invoice but has not produced a proof of delivery.

- The Reorganized Debtors dispute one charge in the amount of \$2,700 relating to a debit memo for tooling costs. Bosch believes that this amount is properly payable. Attached as **Exhibit A** is a copy of the documentation supporting this claim.

4. In light of the relatively modest amounts owing, Bosch is hopeful that it will be able to resolve these matters with the Reorganized Debtors without involvement of this Court. Nevertheless, as a precautionary measure, Bosch is filing this Response in order to preserve its rights.<sup>1</sup>

WHEREFORE, Bosch respectfully requests that this Court overrule the Reorganized Debtors' 43<sup>rd</sup> Omnibus Claims Objection as to Bosch's Administrative Claims and require the Reorganized Debtors to pay Bosch the sum of \$6,597.28.

Respectfully submitted,

Dated: February 23, 2010

WARNER NORCROSS & JUDD LLP

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<sup>1</sup> Bosch's Response is timely because the Reorganized Debtors have granted Bosch an extension to file the Response through 4:00 p.m. on February 23, 2010.